## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Newport News Division

DONNA M. HARRAH,

Plaintiff,

v. Civil Action No. 4:12cv26

BANK OF AMERICA, N.A.,

Defendant.

# DEFENDANT BANK OF AMERICA, N.A.'S MOTION FOR AN EXTENSION OF TIME

Defendant, Bank of America, N.A. ("Bank of America"), by counsel, pursuant to Fed.R.Civ.P. 6(b)(1) and Local Rule 7(F)(2)(b), files this motion for an extension of time to and including August 6, 2012, within which to file its responsive pleadings to the First Amended Complaint filed by Plaintiff, Donna M. Harrah, and states as follows:

Bank of America's counsel continues to review the allegations of the First Amended Complaint and requires additional time to respond to the same. Bank of America's counsel has communicated with counsel for Plaintiff, Donna M. Harrah, who is agreeable to the requested extension. A proposed Agreed Order has been circulated for endorsement by counsel for Plaintiff, Donna M. Harrah, a copy of which is attached hereto as Exhibit 1.

WHEREFORE, Defendant, Bank of America, N.A., by counsel, hereby requests that the Court enter an Order: (1) granting Bank of America's Motion for an Extension of Time; (2) providing Bank of America with an extension of time to file its responsive pleadings, including its Answer, to the First Amended Complaint until on or before August 6, 2012; and (3) awarding Bank of America such further relief as the Court deems appropriate.

### BANK OF AMERICA, N.A.

## By:/s/David N. Anthony

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of July, 2012, I electronically filed the foregoing Motion for an Extension of Time with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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Counsel for Plaintiff

Counsel for Plaintiff

#### /s/ David N. Anthony

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